

February 2, 2009

Cynthia Bryant, Director, Office of Planning and Research
Terry Roberts, State Clearinghouse Director, Office of Planning and Research
P.O. Box 3044
Sacramento, CA 95812-3044

Re: CEQA Guidelines Global Warming Update Pursuant to SB 97 (2007)

The Nature Conservancy (TNC) commends the Governor's Office of Planning and Research (OPR) for its development of the Preliminary Draft CEQA Guideline Amendments for Greenhouse Gas Emissions pursuant to Public Resources Code Section 21083.05. TNC is a leading conservation organization working locally and around the world to protect ecologically important lands and waters for nature and people. Global warming is one of the most pressing issues of our time and threatens the natural systems upon which all life depends. It is therefore critical for California to maintain its leadership and momentum to mitigate global warming and implement measures to help our natural systems and society adapt to any unavoidable effects of global warming. We appreciate the opportunity to provide input on the Preliminary Draft CEQA Guidelines in support of this process and outcome.

In general, TNC supports the overall effort by OPR to amend the CEQA Guidelines to address the climate impacts of projects. In particular, we appreciate the recognition that forests have an important role to play in the global warming solution. The added language to Section II of Appendix G to consider forest resources in the same manner as agricultural resources is critical. Forests not only provide a host of natural resource benefits, such as water quality, biodiversity, recreation, sustainable timber production, but also significant climate benefits. Conversion of forests to non-forest use would create significant loss of sequestration capacity and direct emissions of greenhouse gases. When forests are disturbed through deforestation, much of the carbon that is stored in the forest biomass is released to the atmosphere as carbon dioxide. In many instances, once these forests are lost to development or other non-forest uses, they are never restored, resulting in the loss of the future sequestration that these forests once provided. We, therefore, urge OPR to maintain this language in the future Draft CEQA Guideline Amendments when the formal rulemaking process begins.

TNC also recommends adding language specific to land conversion as a source of greenhouse gases and lost carbon sequestration in Section 15064.4, so that the significance of these impacts can be considered and assessed. Tables could be developed, based on readily available data and methodologies, to reasonably estimate the GHG impacts of conversion activities. We support the language offered by The Pacific Forest Trust in their letter to OPR dated January 30, 2009, which would add a new section (a)(4), as follows:

(a)(4) The extent to which the project may result in the conversion of land that contributes to greenhouse gas emission from the loss of carbon stocks and/or loss of future sequestration capacity.

TNC appreciates the opportunity to provide input on this critically important effort and acknowledges the significant amount of work that the OPR have invested in the Preliminary Draft CEQA Guideline Amendments. We look forward to continued work with the OPR, state agencies, and other stakeholders to provide support for California's leadership and solutions to address global warming.

Contacts: Sally Liu: SLiu@tnc.org
Michelle Passero: MPassero@tnc.org